

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DANIEL DYMTROW,)	
)	
Plaintiff,)	
)	Civil Action No. 07 CV 11277 (RJS)
)	
v.)	
)	
TAYLOR SWIFT, SCOTT SWIFT and)	
ANDREA SWIFT,)	
Defendants.)	

NOTICE OF MOTION TO DISMISS THE COMPLAINT


PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Transmittal Declaration of Howard H. Weller, Defendants Taylor Swift, Scott Swift and Andrea Swift move this Court before the Honorable Richard J. Sullivan, United States District Court Judge for the Southern District of New York, for an order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Complaint in its entirety with prejudice.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order set forth at the pre-motion conference dated April 8, 2008, papers in opposition to this Motion are to be served by May 15, 2008.

DATED: April 15, 2008
New York, New York

MITCHELL, SILBERBERG & KNUPP LLP

By: _____


Paul V. LiCalsi (PL-6622)
Howard H. Weller (HW-2745)
12 East 49th Street, 30th Fl
New York, NY 10020
(917) 546-7707 (T)
(917) 546-7677 (F)
*Attorneys for Defendants Taylor Swift,
Scott Swift and Andrea Swift*